

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NORTH DAKOTA**

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In re:

EPIC Companies Midwest, LLC,  
EPIC Companies Midwest 2023, LLC,  
EPIC Employee, LLC,  
EOLA Capital, LLC, and  
EC West Fargo, LLC,

Debtors.<sup>1</sup>

**Jointly Administered**

Bankruptcy No. 24-30281  
Bankruptcy No. 24-30282  
Bankruptcy No. 24-30283  
Bankruptcy No. 24-30284  
Bankruptcy No. 24-30285

Chapter 11

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**SEVENTH APPLICATION OF FREDRIKSON & BYRON, P.A. FOR ALLOWANCE  
OF FEES AND EXPENSES AS CHAPTER 11 COUNSEL FOR THE DEBTORS FROM  
FEBRUARY 1, 2025 THROUGH FEBRUARY 28, 2025**

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1. Steven R. Kinsella and Fredrikson & Byron, P.A. (collectively, “Fredrikson”) make this Application for allowance of fees for professional services rendered and for reimbursement of expenses incurred as Chapter 11 counsel for EPIC Companies Midwest, LLC, EPIC Companies Midwest 2023, LLC, EPIC Employee, LLC, EOLA Capital, LLC, and EC West Fargo, LLC (collectively, the “Debtors”) between February 1, 2025 and February 28, 2025 pursuant to 11 U.S.C. § 330.

2. In support of this Application, Fredrikson respectfully states as follows:

**JURISDICTION**

3. This Court has jurisdiction over this Application pursuant to 28 U.S.C. §§ 157 and 1334 and Fed. R. Bankr. P. 5005. This a core proceeding pursuant to 28 U.S.C. § 157(b). Venue

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<sup>1</sup> In accordance with Fed. R. Bankr. P. 2002(n) and 1005 and 11 U.S.C. § 342(c), as applicable, the Debtors’ address is 400 10th Street SE, Minot, ND 58701 and their Employer Identification Numbers (EINs) are as follows: 83-2840705 (EPIC Companies Midwest, LLC), 88-3709518 (EPIC Companies Midwest 2023, LLC), 88-4112082 (EPIC Employee, LLC), 88-0554720 (EOLA Capital, LLC) and 82-5331354 (EC West Fargo, LLC).

is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409. The petitions commencing these Chapter 11 cases were filed on July 8, 2024 (the “Petition Date”). The cases are currently pending before this Court.

4. This Application arises under 11 U.S.C. §§ 503(b)(2), 328(a), 330, and 331. This Application is filed under Fed. R. Bankr. P. 2016 and 2002(a)(6). Notice of this Application is provided pursuant to the Notice and Service Requirements adopted pursuant to Local Rule 2002-1 and the Court’s order limiting notice pursuant to Fed. R. Bankr. P. 2002(i). (ECF No. 124.)

#### **BACKGROUND**

5. On the Petition Date, the Debtors filed an application to employ Fredrikson as Chapter 11 counsel for the Debtors effective July 8, 2024. (ECF No. 13.) The Court approved the application to employ Fredrikson on July 25, 2024. (ECF No. 49.) A copy of that order is attached as **Exhibit A**.

6. On the Petition Date, the Debtors also filed a motion for an order establishing interim compensation procedures. (ECF No. 11.) The Court entered an order on August 14, 2024 granting the motion and allowing Fredrikson to file monthly applications for compensation. (ECF No. 72.) A copy of that order is attached as **Exhibit B**.

7. This is Fredrikson’s seventh application for allowance of fees and expenses under 11 U.S.C. § 331. Fredrikson received court approval for the following prior fee applications:

<u><b>Fee Application Amount</b></u>	<u><b>Date of Order Approving Fee Application</b></u>	<u><b>Docket No.</b></u>
\$80,535.96	10/21/2024	148
\$20,172.00	11/14/2024	164
\$37,675.00	12/13/2024	182
\$42,291.00	1/15/2024	206
\$36,048.00	2/12/2025	221

<u>Fee Application Amount</u>	<u>Date of Order Approving Fee Application</u>	<u>Docket No.</u>
\$45,102.50	Pending <sup>2</sup>	Pending
\$261,824.46		

8. Fredrikson believes that the Debtors are current in payment of ordinary operating expenses and any allowed administrative expenses, that any quarterly fees have been or will be paid as required to the United States Trustee, and that all monthly operating reports are being timely filed, including pursuant to any extensions granted by the United States Trustee.

### **RELIEF REQUESTED**

9. **Post-Petition Fees.** By this Application, Fredrikson requests allowance of fees for professional services rendered during these Chapter 11 cases between February 1, 2025 and February 31, 2025 in the amount of **\$62,331.00**, and reimbursement of expenses in the amount of **\$735.00**, for a total of **\$63,066.00**.

10. The professional services rendered by Fredrikson are detailed on the attached **Exhibit C**. Those services include the tasks specifically described below:

#### **(5001) Asset Analysis and Recovery: \$28,678.50**

Services include meeting with the Chief Restructuring Officer (“CRO”) to conduct asset analyses and analyze settlement proposals; drafting complaints against borrowers; meeting with conflicts counsel regarding additional adversary proceedings; drafting settlement proposals and agreements; reviewing foreclosure actions filed in North Dakota against certain borrowers; drafting mediation statement; and communicating with the mediator.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	31.2	2025	\$635	\$19,812.00
Katherine A. Nixon	17.7	2025	\$485	\$8,584.50
Shataia Stallings	1.2	2025	\$235	282.00
<b>TOTAL</b>	<b>50.1</b>			<b>\$28,678.50</b>

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<sup>2</sup> The objection deadline for Fredrikson’s sixth fee application is March 7, 2025. (ECF No. 223.)

Blended Hourly Rate:	\$572.43
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**(5006) Business Operations: \$127.00**

Services include communicating with the CRO regarding an operational issue and addressing a tax notice issue.

Name	Hours	Year	Hourly Rate	Fees
Steven R. Kinsella	0.2	2025	\$635	\$127.00
<b>TOTAL</b>	<b>0.2</b>			<b>\$127.00</b>

Blended Hourly Rate:	\$635.00
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**(5007) Claims Administration and Objections: \$63.50**

Services include analyzing claim purchases and providing instruction regarding recording.

Name	Hours	Year	Hourly Rate	Fees
Steven R. Kinsella	0.1	2025	\$635	\$63.50
<b>TOTAL</b>	<b>0.1</b>			<b>\$63.50</b>

Blended Hourly Rate:	\$635.00
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**(5010) Employment and Fee Applications: \$2,482.00**

Services include communicating with the CRO regarding application to employ conflicts counsel; communicating with potential tax accountant and drafting an application to employ the same; drafting Fredrikson's sixth fee application; and assisting in preparing the CRO's sixth monthly staffing report.

Name	Hours	Year	Hourly Rate	Fees
Steven R. Kinsella	1.9	2025	\$635	\$1,206.50
Katherine A. Nixon	2.0	2025	\$485	\$970.00
Shataia Stallings	1.3	2025	\$235	\$305.50
<b>TOTAL</b>	<b>5.2</b>			<b>\$2,482.00</b>

Blended Hourly Rate:	\$477.30
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**(5013) Meetings and Communications with Creditors: \$2,116.50**

Services include communicating with various creditors and counsel for the official committee of unsecured creditors (the “Committee”); meeting with the Committee; and preparing a creditor update from the CRO.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	3.0	2025	\$635	\$1,905.00
Katherine A. Nixon	0.9	2025	\$485	\$211.50
<b>TOTAL</b>	<b>3.9</b>			<b>\$2,116.50</b>

Blended Hourly Rate: \$542.69

**(5015) Plan and Disclosure Statement: \$10,207.00**

Services include drafting plan of liquidation; revising motion for substantive consolidation; analyzing liquidating trust equity holding company issue; drafting disclosure statement; and analyzing North Dakota corporate law issues.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	12.2	2025	\$635	\$7,747.00
Katherine A. Nixon	2.4	2025	\$485	\$1,164.00
Michael S. Raum	0.6	2025	\$480	\$288.00
David B. Tibbals	2.8	2025	\$360	\$1,008.00
<b>TOTAL</b>	<b>18.0</b>			<b>\$10,207.00</b>

Blended Hourly Rate: \$567.06

**(5018) Reporting: \$793.00**

Services include assisting the CRO in finalizing monthly operating reports; emailing counsel for the United States Trustee regarding bank records; addressing creditor questions regarding schedules and statements.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	0.8	2025	\$635	\$508.00
Katherine A. Nixon	0.2	2025	\$485	\$97.00
Shataia Stallings	0.8	2025	\$235	\$188.00
<b>TOTAL</b>	<b>1.8</b>			<b>\$793.00</b>

Blended Hourly Rate: \$440.56

**(0004) Adversary Proceeding Against Boulevard Square II, LLC et al.: \$2,757.50**

Services include addressing notice of returned mail and reviewing supplemental certificate of service; preparing summary of garnishment issues; drafting, revising, and finalizing garnishment documents; and coordinating service of garnishment summonses.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Katherine A. Nixon	2.9	2025	\$485	\$1,406.50
Austin Artz	3.9	2025	\$330	\$1,287.00
Abigale R. Griffin	0.2	2025	\$320	\$64.00
<b>TOTAL</b>	<b>7.0</b>			<b>\$2,757.50</b>

Blended Hourly Rate:	\$393.93
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**(0005) Adversary Proceeding Against Pioneer Place, LLC: \$3,987.00**

Services include analyzing garnishment issues; drafting garnishment documents; and communicating regarding settlement proposal.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	1.2	2025	\$635	\$762.00
Katherine A. Nixon	2.6	2025	\$485	\$1,261.00
Austin Artz	4.4	2025	\$330	\$1,452.00
Abigale R. Griffin	1.6	2025	\$320	\$512.00
<b>TOTAL</b>	<b>9.8</b>			<b>\$3,987.00</b>

Blended Hourly Rate:	\$397.65
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**(0006) Adversary Proceeding Against SAD Downtown, LLC: \$1,097.00**

Services include preparing for status conference; reviewing jury trial issue; and responding to email from court staff regarding scheduling.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	0.2	2025	\$635	\$127.00
Katherine A. Nixon	2.0	2025	\$485	\$970.00
<b>TOTAL</b>	<b>2.2</b>			<b>\$1,097.00</b>

Blended Hourly Rate:	\$498.63
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**(0007) Adversary Proceeding Against Greenfield Commons, LLC et al.: \$966.50**

Services include reviewing and analyzing settlement proposals; drafting motion for default judgment; and communicating with defense counsel.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	0.3	2025	\$635	\$190.50
Katherine A. Nixon	1.6	2025	\$485	\$776.00
<b>TOTAL</b>	<b>1.9</b>			<b>\$966.50</b>

Blended Hourly Rate: \$508.68

**(0008) Adversary Proceeding Against EPIC Holdings II, LLC: \$3,051.50**

Services include analyzing and revising settlement proposals; negotiating settlement terms; communicating with defense counsel; attending scheduling conference; and drafting settlement agreement.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	4.5	2025	\$635	\$2,857.50
Katherine A. Nixon	0.4	2025	\$485	\$194.00
<b>TOTAL</b>	<b>4.9</b>			<b>\$3,051.50</b>

Blended Hourly Rate: \$622.76

**(0009) Adversary Proceeding Against U of J MU Jamestown, LLC: \$1,247.00**

Services include revising settlement agreement; communicating with the defendant regarding the same; and drafting motion to approve settlement.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	1.2	2025	\$635	\$762.00
Katherine A. Nixon	1.0	2025	\$485	\$485.00
<b>TOTAL</b>	<b>2.2</b>			<b>\$1,247.00</b>

Blended Hourly Rate: \$566.82

**(0011) Adversary Proceeding Against 36th and Veterans, LLC: \$829.00**

Services include addressing notice of returned mail and reviewing supplemental certificate of service; communicating with defense counsel; reviewing answer and emailing the CRO regarding the same; and reviewing the draft scheduling order.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	1.0	2025	\$635	\$635.00
Katherine A. Nixon	0.4	2025	\$485	\$194.00
<b>TOTAL</b>	<b>1.4</b>			<b>\$829.00</b>

Blended Hourly Rate: \$592.14

**(0012) Adversary Proceeding Against LTC – The Lincoln, LLC: \$1,269.00**

Services include revising the complaint based on updated amounts owed; communicating with defense counsel; and preparing settlement proposals.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	0.7	2025	\$635	\$444.50
Katherine A. Nixon	1.7	2025	\$485	\$824.50
<b>TOTAL</b>	<b>2.4</b>			<b>\$1,269.00</b>

Blended Hourly Rate: \$528.75

**(0013) Adversary Proceeding Against Pioneer Place Holdings, LLC: \$1,905.00**

Services include preparing settlement proposals; drafting term sheet; analyzing garnishment issues; analyzing operating agreement and reviewing organizational documents.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	3.0	2025	\$635	\$1,905.00
<b>TOTAL</b>	<b>3.0</b>			<b>\$1,905.00</b>

Blended Hourly Rate: \$635.00

**(0014) Adversary Proceeding Against EPIC Management, LLC: \$436.50**

Services include drafting and finalizing motion for default judgment.

Name	Hours	Year	Hourly Rate	Fees
Katherine A. Nixon	0.9	2025	\$485	\$436.50
<b>TOTAL</b>	<b>0.9</b>			<b>\$436.50</b>

Blended Hourly Rate: \$485.00

**(0017) Adversary Proceeding Against LTC – The Falcon, LLC: \$63.50**

Services include reviewing order approving settlement.

Name	Hours	Year	Hourly Rate	Fees
Steven R. Kinsella	0.1	2025	\$635	\$63.50
<b>TOTAL</b>	<b>0.1</b>			<b>\$63.50</b>

Blended Hourly Rate: \$635.00

**(0018) Adversary Proceeding Against EPIC Holdings, LLC: \$254.00**

Services include reviewing settlement proposal and sending to defense counsel.

Name	Hours	Year	Hourly Rate	Fees
Steven R. Kinsella	0.4	2025	\$635	\$254.00
<b>TOTAL</b>	<b>0.4</b>			<b>\$254.00</b>

Blended Hourly Rate: \$635.00

**TOTAL POST-PETITION FEES: \$62,331.00**

11. **Reimbursement of Expenses.** In the course of this representation, Fredrikson has also incurred expenses detailed as part of Matter Nos. 5000, 0004, and 0005 on Exhibit C, and requests allowance thereof as follows:

<b>Expenses</b>	<b>Amount</b>
Summons and Complaint – Filing Fees	\$700.00
Foreign Judgment – Filing Fee	\$10.00
Garnishment Fee Check	\$25.00
<b>TOTAL</b>	<b>\$735.00</b>

**TOTAL EXPENSES: \$735.00**

12. All services for which fees are requested by Fredrikson were performed for and on behalf of the Debtors, and not on behalf of any committee, creditor, or other person.

13. The amount requested constitutes reasonable compensation for actual, necessary services rendered by Fredrikson, based on the nature, the extent, and the value of such services, the time spent on such services, and the cost of comparable services other than in a case under Title 11. Fredrikson has not entered into any agreement, express or implied, with any other party-in-interest, including the Debtors, any creditor, receiver, trustee, or any representative of any of them, or with any attorney for such party-in-interest in the proceedings, for the purpose of fixing fees or other compensation to be paid to such party-in-interest in the proceedings for services rendered or expenses incurred from the assets of the estate in excess of the compensation allowed by law.

**WHEREFORE**, Fredrikson respectfully requests that the Court enter an order:

- A. Allowing Fredrikson's fees incurred between February 1, 2025 and February 28, 2025 in the amount of **\$62,331.00**, and expenses in the amount of **\$735.00**, totaling **\$63,066.00**;
- B. Authorizing the Debtors to pay Fredrikson such allowed postpetition fees and expenses;

C. Granting administrative expense priority to Fredrikson's allowed fees and expenses; and

D. Granting such other and further relief as may be just and proper.

Dated: March 7, 2025

/e/ Steven R. Kinsella

Michael S. Raum (#05676)

**FREDRIKSON & BYRON, P.A.**

51 Broadway, Suite 400

Fargo, ND 58102-4991

701.237.8200

mraum@fredlaw.com

Steven R. Kinsella (#09514)

Katherine A. Nixon (*pro hac vice* MN #0402772)

**FREDRIKSON & BYRON, P.A.**

60 South 6<sup>th</sup> Street, Suite 1500

Minneapolis, MN 55402-4400

612.492.7000

skinsella@fredlaw.com

knixon@fredlaw.com

**ATTORNEYS FOR DEBTORS**

**AFFIDAVIT**

I, Steven R. Kinsella, an attorney at the law firm of Fredrikson & Byron, P.A., declare under penalty of perjury that the foregoing Fifth Application of Fredrikson & Byron, P.A. for Allowance of Fees and Expenses as Chapter 11 Counsel for the Debtors from February 1, 2025 Through February 28, 2025 is true and correct according to the best of my knowledge, information, and belief.

Dated: March 7, 2025

/e/ Steven R. Kinsella

Steven R. Kinsella

**EXHIBIT A**

**CourtAlert® Case Management**

**From:** ecf@ndb.uscourts.gov  
**Sent:** 7/25/2024 12:56:27 PM  
**To:** nate\_olson@ndb.uscourts.gov  
**Subject:** Ch-11 24-30281 EPIC Companies Midwest, LLC Order on Application to Employ

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**CAUTION: EXTERNAL E-MAIL**

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**\*\*\*NOTE TO PUBLIC ACCESS USERS\*\*\*** Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30-page limit do not apply.

**U.S. Bankruptcy Court**

**District of North Dakota**

Notice of Electronic Filing

The following transaction was received from vck, Court entered on 7/25/2024 at 12:56 PM CDT and filed on 7/25/2024

**Case Name:** EPIC Companies Midwest, LLC

**Case Number:** [24-30281](#)

**Document Number:** [49](#)

**Docket Text:**

Order Approving Application to Employ Steven R. Kinsella and Fredrikson & Byron, P.A. as counsel for Debtor EPIC Companies Midwest, LLC effective July 8, 2024 (Related Doc. [13]). The application to employ is APPROVED subject to the limitations on compensation provided by 11 U.S.C. § 328. This order is not a determination that the services or rates charged are necessary and reasonable. The person or entity employed under this order shall file a fee application in accordance with the Bankruptcy Code and Federal Rules of Bankruptcy Procedures. See Fed. R. Bank. P. 2016, 2017 and 11 U.S.C. 329, 330. Applicant must also comply with Local Rules. As required by applicable federal rule or statute, the Movant shall serve this docket text only order on all appropriate parties that will not receive notice of electronic filing. By Judge Shon Hastings (Text order only). Signed on 7/25/2024 (vck)

The following document(s) are associated with this transaction:

**24-30281 Notice will be electronically mailed to:**

Douglas Christensen on behalf of Creditor Beth Holmes  
dougc@grandforkslaw.com,  
sarah@grandforkslaw.com;jen@grandforkslaw.com;julie@grandforkslaw.com

Michael Gust on behalf of Interested Party Bank Forward  
mlgfilings@andersonbottrell.com, jernst@abstlaw.net

Joseph D Hackman on behalf of Interested Party Bank Forward  
jhackman@abstlaw.net

Peter B. Hankla on behalf of Interested Party Randy and Dorothy Henke  
phankla@mcgeelaw.com

Steven R Kinsella on behalf of Debtor EC West Fargo, LLC  
skinsella@fredlaw.com, sstallings@fredlaw.com;autodockets@fredlaw.com

Steven R Kinsella on behalf of Debtor EOLA Capital, LLC  
skinsella@fredlaw.com, sstallings@fredlaw.com;autodockets@fredlaw.com

Steven R Kinsella on behalf of Debtor EPIC Companies Midwest 2023, LLC  
skinsella@fredlaw.com, sstallings@fredlaw.com;autodockets@fredlaw.com

Steven R Kinsella on behalf of Debtor EPIC Companies Midwest, LLC  
skinsella@fredlaw.com, sstallings@fredlaw.com;autodockets@fredlaw.com

Steven R Kinsella on behalf of Debtor EPIC Employee, LLC  
skinsella@fredlaw.com, sstallings@fredlaw.com;autodockets@fredlaw.com

John M Krings, Jr. on behalf of Creditor Cornerstone Bank  
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Katherine A. Nixon on behalf of Debtor EPIC Companies Midwest, LLC  
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Richard P. Olson on behalf of Creditor Essential Living Inc  
rpolson@minotlaw.com, rpolson@minotlaw.com

Richard P. Olson on behalf of Creditor Bruce & Diane Walker  
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Robert B. Raschke  
USTPRegion12.SX.ECF@usdoj.gov

Michael S Raum on behalf of Debtor EPIC Companies Midwest, LLC  
mraum@fredlaw.com, mraum@fredlaw.com;dtaylor@fredlaw.com

Katrina A. Turman Lang on behalf of Creditor Dietz Properties, LLC  
klang@woldlaw.com, melanie@turmanlaw.com

Katrina A. Turman Lang on behalf of Creditor Candice Dietz  
klang@woldlaw.com, melanie@turmanlaw.com

Katrina A. Turman Lang on behalf of Creditor Larry Dietz  
klang@woldlaw.com, melanie@turmanlaw.com

Sarah J. Wencil on behalf of U.S. Trustee Robert B. Raschke  
sarah.j.wencil@usdoj.gov

Benjamin Williams on behalf of Creditor Cullen Insulation, Inc.  
ben@kennellybusinesslaw.com, beth@kennellybusinesslaw.com

Benjamin Williams on behalf of Creditor Daniel Frisch  
ben@kennellybusinesslaw.com, beth@kennellybusinesslaw.com

**24-30281 Notice will not be electronically mailed to:**

**EXHIBIT B**

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NORTH DAKOTA**

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In re:

EPIC Companies Midwest, LLC,  
EPIC Companies Midwest 2023, LLC,  
EPIC Employee, LLC,  
EOLA Capital, LLC, and  
EC West Fargo, LLC,

Debtors.

**Jointly Administered**

Bankruptcy No. 24-30281  
Bankruptcy No. 24-30282  
Bankruptcy No. 24-30283  
Bankruptcy No. 24-30284  
Bankruptcy No. 24-30285

Chapter 11

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**ORDER ESTABLISHING PROCEDURES FOR INTERIM COMPENSATION AND  
REIMBURSEMENT OF EXPENSES FOR RETAINED PROFESSIONALS**

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Debtors filed a Motion for an Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals and (II) Granting Related Relief. Doc. 11. Pursuant to the notice of the Motion [Doc. 16], objections to the Motion were due by July 30, 2024.

Debtors served notice of the Motion. The Court received no objections to the Motion. The Court held a hearing on the Motion on August 14, 2024. Based upon the Motion and the Declaration of Patrick Finn [Doc. 6] and for the reasons stated on the record at the August 14, 2024, hearing, the Court finds that the circumstances of these cases warrant granting the relief provided below.

**IT IS ORDERED** that, except as otherwise provided in any order of the Court, professionals employed in this bankruptcy case, including Fredrikson & Byron, P.A., shall be permitted to seek interim payment of compensation and reimbursement of expenses by filing monthly applications for interim compensation and reimbursement of expenses.

**IT IS FURTHER ORDERED** that Debtors are authorized to pay all reasonable amounts invoiced by Lighthouse Management Group, Inc. ("Lighthouse") for fees and expenses on a bi-weekly basis.

**IT IS FURTHER ORDERED** that Lighthouse will file with the Court and serve on Debtors, the United States Trustee, and any statutory committee appointed in this case (the "Notice Parties") a monthly staffing report, filed and served by the 20th of each month for the previous month, identifying the Lighthouse employees who worked on this case, the total hours billed by Lighthouse, and a summary of the tasks performed. Lighthouse will also file with the Court and serve on the Notice Parties a quarterly compensation report by the 20th of each month following the end of a quarter, showing the total fees and expenses for the preceding quarter. These reports will be deemed applications for interim compensation under sections 328 and 330. Parties in interest may object to the reports within 21 days after notice. The Court will rule on the applications after the deadline to object passes or after a hearing on the application.

**IT IS FURTHER ORDERED** that Debtors will allocate the fees and expenses approved among Debtors pro rata if the professionals charge for tasks that generally apply to all cases and to the appropriate Debtor if the tasks relate solely to a specific Debtor.

Dated: August 14, 2024.



SHON HASTINGS, JUDGE  
UNITED STATES BANKRUPTCY COURT

**EXHIBIT C**



Invoice: 1914072  
Invoice Date: March 5, 2025  
Client Number: 097807  
Matter Number: 097807.5000

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through February 28, 2025

**Regarding: Case Administration**

Total For Current Costs and Other Charges:	\$ 375.00
<b>Total For Current Invoice:</b>	<b>\$ 375.00</b>

**NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.**

***Payment is due within 30 days from receipt of invoice***

If you have any questions please email [accounting@fredlaw.com](mailto:accounting@fredlaw.com) or contact a client representative at 612.492.7574.

**Remittance Address:**

Fredrikson & Byron P.A.  
P.O. Box 1484  
Minneapolis, MN 55480-1484

**Online Payments:**

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**Tax ID:** [REDACTED]

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Invoice: 1914072  
Invoice Date: March 5, 2025  
Page:

#### Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
02/05/25	1907735	64.50		64.50
<b>Total Prior Balance:</b>				<b>\$ 64.50</b>

To avoid duplicate payments, the Prior Balance reflects what was still due as of March 5, 2025. If payment has been sent close to this date, please verify payment status.



Invoice: 1914072  
Invoice Date: March 5, 2025  
Client Number: 097807  
Matter Number: 097807.5000

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

### Costs and Other Charges

		<u>Amount</u>
02/20/25	COURTS/USBC-ND-P - Summons and Complaint – Adversary Fee	350.00
02/26/25	Filing fee First International Bank & Trust (100 North Main Street Watford City ND 58854) - 2.26.25 - Garnishment fee check	25.00

**Current Costs and Other Charges:** \$ 375.00

### Invoice Totals

Total For Current Costs and Other Charges: \$ 375.00

**Total For Current Invoice:** \$ 375.00



Invoice: 1914073  
Invoice Date: March 5, 2025  
Client Number: 097807  
Matter Number: 097807.5001

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through February 28, 2025

**Regarding: Asset Analysis and Recovery**

Total for Current Legal Fees:	\$ 28,678.50
<b>Total For Current Invoice:</b>	<b>\$ 28,678.50</b>

**NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.**

*Payment is due within 30 days from receipt of invoice*  
If you have any questions please email [accounting@fredlaw.com](mailto:accounting@fredlaw.com) or contact a client representative at 612.492.7574.

**Remittance Address:**

Fredrikson & Byron P.A.  
P.O. Box 1484  
Minneapolis, MN 55480-1484

**Online Payments:**

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Invoice: 1914073  
Invoice Date: March 5, 2025  
Page:

#### Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
02/05/25	1907736	19,819.50		19,819.50
<b>Total Prior Balance:</b>				<b>\$ 19,819.50</b>

To avoid duplicate payments, the Prior Balance reflects what was still due as of March 5, 2025. If payment has been sent close to this date, please verify payment status.



**Invoice:** 1914073  
**Invoice Date:** March 5, 2025  
**Client Number:** 097807  
**Matter Number:** 097807.5001

EPIC Companies Midwest, LLC  
 Attn: Patrick Finn  
 900 Long Lake Rd, Suite 180  
 Lighthouse Management Group, Inc.  
 New Brighton, MN 55112

### Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
02/03/25	S. Kinsella	Meeting with CRO (.8); update analysis of outstanding settlement negotiations (.4); provide instruction regarding additional complaints (.2).	1.40	889.00
02/03/25	K. Nixon	Meeting with CRO regarding asset analysis (0.9); draft complaint against borrower(s) (6.3); email A. Griffin re: garnishments (0.1).	7.30	3,540.50
02/04/25	S. Kinsella	Meeting with CRO regarding settlement negotiations (.5); analyze equity interest settlement proposal (1.3).	1.80	1,143.00
02/04/25	K. Nixon	Revise complaint(s) against borrowers.	0.20	97.00
02/05/25	S. Kinsella	Analyze settlement proposal.	0.10	63.50
02/05/25	K. Nixon	Emails to A. Griffin re: timing of garnishments.	0.20	97.00
02/06/25	S. Kinsella	Analyze settlement proposal and phone call with CRO regarding the same.	0.90	571.50
02/07/25	S. Kinsella	Communications with counsel for project borrower (.3); phone calls with CRO regarding settlement proposals (.4).	0.70	444.50
02/10/25	K. Nixon	Meeting with CRO regarding asset analysis (0.5); emails to conflicts counsel re: adversary proceeding information (0.4).	0.90	436.50
02/10/25	S. Kinsella	Multiple meetings with CRO regarding settlement proposals (2.1); analyze settlement proposals (.4).	2.50	1,587.50
02/11/25	S. Kinsella	Meeting with CRO and project borrower regarding settlement (1.1); follow up call and analysis with CRO (.5).	1.60	1,016.00
02/12/25	S. Kinsella	Review project borrower financial information in connection with settlement proposal.	0.60	381.00
02/13/25	K. Nixon	Meeting with CRO and conflicts counsel and follow-up emails to the same.	0.90	436.50



Invoice:  
Invoice Date:  
Page:

1914073  
March 5, 2025  
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02/13/25	S. Kinsella	Discuss settlement proposal with CRO (.7); finalize complaint drafts (.2); coordinate strategy with special litigation counsel (.6).	1.50	952.50
02/14/25	S. Kinsella	Draft settlement agreement.	1.10	698.50
02/17/25	K. Nixon	Meeting with CRO regarding asset analysis.	0.80	388.00
02/17/25	S. Kinsella	Meeting with CRO (.8); communications with project borrower counsel (.2); finalize draft settlement agreement (.5).	1.50	952.50
02/18/25	K. Nixon	Strategize re: additional complaint(s) against borrowers.	0.20	97.00
02/18/25	S. Kinsella	Phone call with borrower's counsel (.5); follow up phone call with CRO regarding the same (6); analyze settlement proposal (.4); phone call with CRO regarding strategy (.6).	2.10	1,333.50
02/18/25	S. Stallings	Attention to foreclosure actions filed in North Dakota against certain borrowers (.6); review foreclosure complaints and court orders (.6).	1.20	282.00
02/19/25	K. Nixon	Draft complaint against borrower.	1.60	776.00
02/19/25	S. Kinsella	Finalize complaint against Fargo South Hospitality (.3); research related issue (.4); communications with borrowers' counsel regarding settlement (.9).	1.60	1,016.00
02/20/25	S. Kinsella	Draft mediation statement.	1.50	952.50
02/20/25	K. Nixon	Finalize complaint against borrower and coordinate service of the same.	0.70	339.50
02/21/25	S. Kinsella	Phone call with CRO regarding settlement negotiations (1.1); provide instruction regarding additional complaints (.3); draft mediation statement (2.8).	4.20	2,667.00
02/21/25	K. Nixon	Strategize re: additional complaint(s) against borrower(s).	0.20	97.00
02/24/25	S. Kinsella	Meeting with CRO regarding status of settlement negotiations and complaints (.5); settlement communications with counsel for project borrowers (.5); review related financial documents (.5); draft mediation statement (4.2).	5.70	3,619.50
02/24/25	K. Nixon	Meeting with CRO regarding asset analysis (0.4); strategize re: additional complaint(s) against borrower(s) (0.4); email J. Klein re: mediation (0.2).	1.00	485.00
02/25/25	S. Kinsella	Communications with mediator.	0.20	127.00
02/25/25	K. Nixon	Draft complaint(s) against borrower(s).	2.90	1,406.50
02/26/25	S. Kinsella	Review and analyze borrower transfer data.	0.20	127.00



Invoice: 1914073  
Invoice Date: March 5, 2025  
Page: 3

02/26/25	K. Nixon	Review and revise draft mediation statement.	0.80	388.00
02/27/25	S. Kinsella	Revise settlement agreement (.1); review financial documents to respond to borrower questions (.4); review settlement counteroffer (.2).	1.70	1,079.50
02/28/25	S. Kinsella	Review CRO revisions to settlement agreement (.1); finalize and send mediation statement (.2).	0.30	190.50
<b>Current Legal Fees:</b>			<b>50.10</b>	<b>\$ 28,678.50</b>

#### Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Steven R. Kinsella	635.00	31.20	19,812.00
Katherine Nixon	485.00	17.70	8,584.50
Shataia Stallings	235.00	1.20	282.00
<b>Total</b>		<b>50.10</b>	<b>\$ 28,678.50</b>

#### Invoice Totals

Total for Current Legal Fees: \$ 28,678.50

**Total For Current Invoice:** **\$ 28,678.50**



Invoice: 1914074  
Invoice Date: March 5, 2025  
Client Number: 097807  
Matter Number: 097807.5006

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through February 28, 2025

**Regarding: Business Operations**

Total for Current Legal Fees:	\$ 127.00
<b>Total For Current Invoice:</b>	<b>\$ 127.00</b>

*Payment is due within 30 days from receipt of invoice*  
If you have any questions please email [accounting@fredlaw.com](mailto:accounting@fredlaw.com) or contact a client representative at 612.492.7574.

**Remittance Address:**

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P.O. Box 1484  
Minneapolis, MN 55480-1484

**Online Payments:**

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Invoice: 1914074  
Invoice Date: March 5, 2025  
Client Number: 097807  
Matter Number: 097807.5006

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

### Legal Fees

Date	Timekeeper	Description	Hours	Amount
02/14/25	S. Kinsella	Communications with client regarding operational issue.	0.10	63.50
02/18/25	S. Kinsella	Communications regarding tax notice issue.	0.10	63.50
<b>Current Legal Fees:</b>			<b>0.20</b>	<b>\$ 127.00</b>

### Timekeeper Summary

Timekeeper	Bill Rate	Hours	Billed Amount
Steven R. Kinsella	635.00	0.20	127.00
<b>Total</b>		<b>0.20</b>	<b>\$ 127.00</b>

### Invoice Totals

Total for Current Legal Fees:	\$ 127.00
<b>Total For Current Invoice:</b>	<b>\$ 127.00</b>



Invoice: 1914075  
Invoice Date: March 5, 2025  
Client Number: 097807  
Matter Number: 097807.5007

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through February 28, 2025

**Regarding: Claims Administration and Objections**

Total for Current Legal Fees:	\$ 63.50
<b>Total For Current Invoice:</b>	<b>\$ 63.50</b>

**NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.**

*Payment is due within 30 days from receipt of invoice*  
If you have any questions please email [accounting@fredlaw.com](mailto:accounting@fredlaw.com) or contact a client representative at 612.492.7574.

**Remittance Address:**

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P.O. Box 1484  
Minneapolis, MN 55480-1484

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Invoice: 1914075  
Invoice Date: March 5, 2025  
Page:

#### Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
02/05/25	1907738	190.50		190.50
<b>Total Prior Balance:</b>				<b>\$ 190.50</b>

To avoid duplicate payments, the Prior Balance reflects what was still due as of March 5, 2025. If payment has been sent close to this date, please verify payment status.



Invoice: 1914075  
Invoice Date: March 5, 2025  
Client Number: 097807  
Matter Number: 097807.5007

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

### Legal Fees

Date	Timekeeper	Description	Hours	Amount
02/07/25	S. Kinsella	Analyze claim purchases and provide instruction regarding recording.	0.10	63.50
	<b>Current Legal Fees:</b>		<b>0.10</b>	<b>\$ 63.50</b>

### Timekeeper Summary

Timekeeper	Bill Rate	Hours	Billed Amount
Steven R. Kinsella	635.00	0.10	63.50
<b>Total</b>		<b>0.10</b>	<b>\$ 63.50</b>

### Invoice Totals

Total for Current Legal Fees:	\$ 63.50
<b>Total For Current Invoice:</b>	<b>\$ 63.50</b>



Invoice: 1914076  
Invoice Date: March 5, 2025  
Client Number: 097807  
Matter Number: 097807.5010

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through February 28, 2025

**Regarding: Employment and Fee Applications**

Total for Current Legal Fees:	\$ 2,482.00
<b>Total For Current Invoice:</b>	<b>\$ 2,482.00</b>

**NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.**

*Payment is due within 30 days from receipt of invoice*  
If you have any questions please email [accounting@fredlaw.com](mailto:accounting@fredlaw.com) or contact a client representative at 612.492.7574.

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Tax ID: [REDACTED]

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Invoice: 1914076  
Invoice Date: March 5, 2025  
Page:

#### Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
02/05/25	1907739	2,698.00		2,698.00
<b>Total Prior Balance:</b>				<b>\$ 2,698.00</b>

To avoid duplicate payments, the Prior Balance reflects what was still due as of March 5, 2025. If payment has been sent close to this date, please verify payment status.



**Invoice:** 1914076  
**Invoice Date:** March 5, 2025  
**Client Number:** 097807  
**Matter Number:** 097807.5010

EPIC Companies Midwest, LLC  
 Attn: Patrick Finn  
 900 Long Lake Rd, Suite 180  
 Lighthouse Management Group, Inc.  
 New Brighton, MN 55112

### Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
02/03/25	K. Nixon	Email CRO re: filed application to employ Fremstad Law.	0.10	48.50
02/03/25	S. Kinsella	Finalize application to employ special litigation counsel.	0.50	317.50
02/04/25	S. Kinsella	Coordinate fee application (.1); communications with potential tax accountant regarding application to employ (.1).	0.20	127.00
02/05/25	K. Nixon	Draft Fredrikson's sixth fee application.	1.40	679.00
02/06/25	K. Nixon	Email S. Stallings re: finalizing Fredrikson sixth fee application.	0.10	48.50
02/06/25	S. Kinsella	Review and revise fee application.	0.20	127.00
02/07/25	S. Kinsella	Review and revise fee application.	0.10	63.50
02/10/25	S. Stallings	Review email and prepare application and affidavit to employ tax accountant for the Debtors.	1.00	235.00
02/11/25	S. Kinsella	Review tax accountant application to employ.	0.20	127.00
02/12/25	S. Kinsella	Attention to tax accountant engagement letter and application.	0.10	63.50
02/14/25	K. Nixon	Finalize Fredrikson's sixth fee app. for filing.	0.10	48.50
02/19/25	K. Nixon	Draft and finalize CRO's sixth monthly staffing report for filing.	0.20	97.00
02/19/25	S. Kinsella	Review tax accountant engagement letters.	0.10	63.50
02/20/25	S. Stallings	Finalize and send draft application to employ to proposed tax accountant.	0.30	70.50
02/20/25	K. Nixon	Email CRO re: approval of December fees.	0.10	48.50
02/20/25	S. Kinsella	Revise accountant application (.2); review order approving special counsel employment application and communications with counsel regarding the same (.2).	0.40	254.00



Invoice: 1914076  
Invoice Date: March 5, 2025  
Page: 2

02/25/25	S. Kinsella	Communications with proposed accountant.	0.10	63.50
<b>Current Legal Fees:</b>			<b>5.20</b>	<b>\$ 2,482.00</b>

#### Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Steven R. Kinsella	635.00	1.90	1,206.50
Katherine Nixon	485.00	2.00	970.00
Shataia Stallings	235.00	1.30	305.50
<b>Total</b>	<b>5.20</b>		<b>\$ 2,482.00</b>

#### Invoice Totals

Total for Current Legal Fees:	\$ 2,482.00
<b>Total For Current Invoice:</b>	<b>\$ 2,482.00</b>



Invoice: 1914077  
Invoice Date: March 5, 2025  
Client Number: 097807  
Matter Number: 097807.5013

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through February 28, 2025

**Regarding: Meetings and Communications with Creditors**

Total for Current Legal Fees:	\$ 2,116.50
<b>Total For Current Invoice:</b>	<b>\$ 2,116.50</b>

**NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.**

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If you have any questions please email [accounting@fredlaw.com](mailto:accounting@fredlaw.com) or contact a client representative at 612.492.7574.

**Remittance Address:**

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Invoice: 1914077  
Invoice Date: March 5, 2025  
Page:

#### Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
11/04/24	1888543	57.50		57.50
02/05/25	1907740	5,724.50		5,724.50
<b>Total Prior Balance:</b>				<b>\$ 5,782.00</b>

To avoid duplicate payments, the Prior Balance reflects what was still due as of March 5, 2025. If payment has been sent close to this date, please verify payment status.



**Invoice:** 1914077  
**Invoice Date:** March 5, 2025  
**Client Number:** 097807  
**Matter Number:** 097807.5013

EPIC Companies Midwest, LLC  
 Attn: Patrick Finn  
 900 Long Lake Rd, Suite 180  
 Lighthouse Management Group, Inc.  
 New Brighton, MN 55112

### Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
02/03/25	S. Kinsella	Communications with Committee counsel regarding settlement proposals.	0.10	63.50
02/04/25	S. Kinsella	Communications with committee counsel regarding settlements.	0.10	63.50
02/05/25	S. Kinsella	Phone call with Committee counsel regarding potential settlements (.3); follow up call with CRO (.3).	0.60	381.00
02/07/25	S. Kinsella	Communications with Committee counsel.	0.10	63.50
02/07/25	S. Stallings	Attention to creditor addition to court clerk and respond to P. Finn regarding new creditor needing to file a claim.	0.30	70.50
02/11/25	S. Kinsella	Meeting with Committee counsel.	0.40	254.00
02/14/25	S. Kinsella	Communications with counsel for creditor.	0.10	63.50
02/18/25	S. Kinsella	Review and revise CRO notification to creditors.	0.60	381.00
02/19/25	S. Kinsella	Communications with committee counsel.	0.10	63.50
02/20/25	S. Kinsella	Phone call with Committee counsel.	0.40	254.00
02/21/25	S. Kinsella	Review Committee proposed changes to creditor communication.	0.20	127.00
02/24/25	S. Kinsella	Finalize creditor update.	0.30	190.50
02/28/25	S. Stallings	Attention to email from investor and amount debtor listed on statement of financial affairs (.2); review statement of financial affairs and locate client information for schedules and respond (.4).	0.60	141.00
<b>Current Legal Fees:</b>			<b>3.90</b>	<b>\$ 2,116.50</b>



Invoice: 1914077  
Invoice Date: March 5, 2025  
Page: 2

### Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Steven R. Kinsella	635.00	3.00	1,905.00
Shataia Stallings	235.00	0.90	211.50
<b>Total</b>		<b>3.90</b>	<b>\$ 2,116.50</b>

### Invoice Totals

Total for Current Legal Fees: \$ 2,116.50

**Total For Current Invoice:** **\$ 2,116.50**



Invoice: 1914078  
Invoice Date: March 5, 2025  
Client Number: 097807  
Matter Number: 097807.5015

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through February 28, 2025

**Regarding: Plan and Disclosure Statement**

Total for Current Legal Fees:	\$ 10,207.00
<b>Total For Current Invoice:</b>	<b>\$ 10,207.00</b>

**NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.**

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If you have any questions please email [accounting@fredlaw.com](mailto:accounting@fredlaw.com) or contact a client representative at 612.492.7574.

**Remittance Address:**

Fredrikson & Byron P.A.  
P.O. Box 1484  
Minneapolis, MN 55480-1484

**Online Payments:**

[Fredlaw.com/payment](http://Fredlaw.com/payment)

**Wire Instructions:**



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**Tax ID:** [REDACTED]

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**Please remit this page with your payment. Thank you. We appreciate your business.**



Invoice: 1914078  
Invoice Date: March 5, 2025  
Page:

#### Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
02/05/25	1907741	6,666.50		6,666.50
<b>Total Prior Balance:</b>				<b>\$ 6,666.50</b>

To avoid duplicate payments, the Prior Balance reflects what was still due as of March 5, 2025. If payment has been sent close to this date, please verify payment status.



**Invoice:** 1914078  
**Invoice Date:** March 5, 2025  
**Client Number:** 097807  
**Matter Number:** 097807.5015

EPIC Companies Midwest, LLC  
 Attn: Patrick Finn  
 900 Long Lake Rd, Suite 180  
 Lighthouse Management Group, Inc.  
 New Brighton, MN 55112

### Legal Fees

<b>Date</b>	<b>Timekeeper</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
02/03/25	S. Kinsella	Draft plan.	0.40	254.00
02/04/25	S. Kinsella	Continue to draft plan.	1.20	762.00
02/05/25	S. Kinsella	Continue to draft plan.	1.90	1,206.50
02/10/25	S. Kinsella	Continue to draft plan.	1.00	635.00
02/11/25	S. Kinsella	Analyze liquidating trust equity holding company issue.	0.20	127.00
02/11/25	K. Nixon	Revise motion for substantive consolidation.	0.80	388.00
02/12/25	S. Kinsella	Revise substantive consolidation motion (.5); draft plan (.4).	0.90	571.50
02/12/25	K. Nixon	Revise motion for substantive consolidation.	1.50	727.50
02/13/25	S. Kinsella	Continue to draft plan.	1.80	1,143.00
02/13/25	K. Nixon	Revise motion for substantive consolidation.	0.10	48.50
02/18/25	S. Kinsella	Continue to draft plan (.3); analyze borrower organization documents and revisions required for equity proposal (.7).	1.00	635.00
02/18/25	D. Tibbals	Research operating agreement mechanics w/r/t capital calls and dilution and prepare list of proposed revisions.	0.80	288.00
02/18/25	M. Raum	Analyze North Dakota corporate matters related to negotiations of anti-dilution and minority protection provisions.	0.60	288.00
02/27/25	S. Kinsella	Draft disclosure statement.	2.00	1,270.00
02/28/25	S. Kinsella	Continue to draft disclosure statement.	1.80	1,143.00
02/28/25	D. Tibbals	Drafted letter/memo outlining proposed operating agreement revisions to address disproportionate dilution, board seat, and minority protections.	2.00	720.00
<b>Current Legal Fees:</b>			<b>18.00</b>	<b>\$ 10,207.00</b>



Invoice: 1914078  
Invoice Date: March 5, 2025  
Page: 2

### Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Steven R. Kinsella	635.00	12.20	7,747.00
Katherine Nixon	485.00	2.40	1,164.00
Michael S. Raum	480.00	0.60	288.00
David B. Tibbals	360.00	2.80	1,008.00
<b>Total</b>		<b>18.00</b>	<b>\$ 10,207.00</b>

### Invoice Totals

Total for Current Legal Fees: \$ 10,207.00

**Total For Current Invoice:** **\$ 10,207.00**



Invoice: 1914079  
Invoice Date: March 5, 2025  
Client Number: 097807  
Matter Number: 097807.5018

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through February 28, 2025

**Regarding: Reporting**

Total for Current Legal Fees:	\$ 793.00
<b>Total For Current Invoice:</b>	<b>\$ 793.00</b>

**NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.**

*Payment is due within 30 days from receipt of invoice*  
If you have any questions please email [accounting@fredlaw.com](mailto:accounting@fredlaw.com) or contact a client representative at 612.492.7574.

**Remittance Address:**

Fredrikson & Byron P.A.  
P.O. Box 1484  
Minneapolis, MN 55480-1484

**Online Payments:**

[Fredlaw.com/payment](http://Fredlaw.com/payment)

**Wire Instructions:**



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**Tax ID:** [REDACTED]

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Invoice: 1914079  
Invoice Date: March 5, 2025  
Page:

#### Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
09/05/24	1876154	7,565.50	(3,001.50)	4,564.00
02/05/25	1907742	358.50		358.50
<b>Total Prior Balance:</b>				<b>\$ 4,922.50</b>

To avoid duplicate payments, the Prior Balance reflects what was still due as of March 5, 2025. If payment has been sent close to this date, please verify payment status.



Invoice: 1914079  
Invoice Date: March 5, 2025  
Client Number: 097807  
Matter Number: 097807.5018

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

### Legal Fees

Date	Timekeeper	Description	Hours	Amount
02/20/25	K. Nixon	Review January MORs.	0.20	97.00
02/20/25	S. Stallings	Attention to finalizing and e-filing monthly operating reports for January and submitting bank records to UST.	0.80	188.00
02/27/25	S. Kinsella	Research response to creditor schedule question.	0.40	254.00
02/28/25	S. Kinsella	Review schedules and respond to creditor questions regarding the same.	0.40	254.00
<b>Current Legal Fees:</b>			<b>1.80</b>	<b>\$ 793.00</b>

### Timekeeper Summary

Timekeeper	Bill Rate	Hours	Billed Amount
Steven R. Kinsella	635.00	0.80	508.00
Katherine Nixon	485.00	0.20	97.00
Shataia Stallings	235.00	0.80	188.00
<b>Total</b>		<b>1.80</b>	<b>\$ 793.00</b>

### Invoice Totals

Total for Current Legal Fees: \$ 793.00

**Total For Current Invoice:** \$ 793.00



Invoice: 1914080  
Invoice Date: March 5, 2025  
Client Number: 097807  
Matter Number: 097807.0004

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through February 28, 2025

**Regarding: Adversary against Boulevard Square**

Total for Current Legal Fees:	\$ 2,757.50
Total For Current Costs and Other Charges:	\$ 10.00
<b>Total For Current Invoice:</b>	<b>\$ 2,767.50</b>

**NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.**

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**Remittance Address:**

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P.O. Box 1484  
Minneapolis, MN 55480-1484

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**Tax ID:** [REDACTED]

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**Please remit this page with your payment. Thank you. We appreciate your business.**



Invoice: 1914080  
Invoice Date: March 5, 2025  
Page:

#### Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
02/05/25	1907744	2,862.00		2,862.00
<b>Total Prior Balance:</b>				<b>\$ 2,862.00</b>

To avoid duplicate payments, the Prior Balance reflects what was still due as of March 5, 2025. If payment has been sent close to this date, please verify payment status.



Invoice: 1914080  
Invoice Date: March 5, 2025  
Client Number: 097807  
Matter Number: 097807.0004

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

### Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
02/04/25	A. Griffin	Draft and provide Notice of Garnishment to K. Nixon and S. Kinsella.	0.20	64.00
02/05/25	K. Nixon	Attention to notice of returned mail.	0.10	48.50
02/07/25	K. Nixon	Review supplemental certificate of service.	0.10	48.50
02/21/25	A. Artz	Analyze 10 day notice period under section 32-09.1-04.	0.20	66.00
02/24/25	A. Artz	Prepare summary of garnishment issues.	0.10	33.00
02/25/25	A. Artz	Summarize outstanding garnishment issues.	0.10	33.00
02/26/25	A. Artz	Review file documents and confirm procedure (.2); create and draft garnishment summons and disclosures (.5).	0.70	231.00
02/27/25	K. Nixon	Attention to garnishment issues.	0.70	339.50
02/27/25	A. Artz	Draft garnishment summons and disclosures.	2.40	792.00
02/28/25	K. Nixon	Finalize garnishment summonses, disclosure forms, and cover letters.	2.00	970.00
02/28/25	A. Artz	Coordinate garnishment summonses.	0.40	132.00
<b>Current Legal Fees:</b>			<b>7.00</b>	<b>\$ 2,757.50</b>

### Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Katherine Nixon	485.00	2.90	1,406.50
Austin Artz	330.00	3.90	1,287.00
Abigale R. Griffin	320.00	0.20	64.00
<b>Total</b>		<b>7.00</b>	<b>\$ 2,757.50</b>



Invoice: 1914080  
Invoice Date: March 5, 2025  
Page: 2

**Costs and Other Charges**

		<u>Amount</u>
01/23/25	Filing fee Cass County Clerk of District Court - 1.23.2025 24-0723 - Foreign Judgment Fee	(10.00)
02/21/25	US Bancorp (PO Box 6343 Fargo ND 58125) - Fargo 021525 - Cass County District Court	10.00
02/21/25	Filing fee US Bancorp (PO Box 6343 Fargo ND 58125) - Fargo 021525 - Ward County District Court	10.00

**Current Costs and Other Charges:** \$ 10.00

**Invoice Totals**

Total for Current Legal Fees: \$ 2,757.50

Total For Current Costs and Other Charges: \$ 10.00

**Total For Current Invoice:** \$ 2,767.50



Invoice: 1914081  
Invoice Date: March 5, 2025  
Client Number: 097807  
Matter Number: 097807.0005

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through February 28, 2025

**Regarding: Adversary against Pioneer Place, LLC**

Total for Current Legal Fees:	\$ 3,987.00
Total For Current Costs and Other Charges:	\$ 350.00
<b>Total For Current Invoice:</b>	<b>\$ 4,337.00</b>

**NOTE:** Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

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If you have any questions please email [accounting@fredlaw.com](mailto:accounting@fredlaw.com) or contact a client representative at 612.492.7574.

**Remittance Address:**

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Minneapolis, MN 55480-1484

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**Tax ID:** [REDACTED]

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Invoice: 1914081  
Invoice Date: March 5, 2025  
Page:

#### Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
02/05/25	1907745	1,066.50		1,066.50
<b>Total Prior Balance:</b>				<b>\$ 1,066.50</b>

To avoid duplicate payments, the Prior Balance reflects what was still due as of March 5, 2025. If payment has been sent close to this date, please verify payment status.



**Invoice:** 1914081  
**Invoice Date:** March 5, 2025  
**Client Number:** 097807  
**Matter Number:** 097807.0005

EPIC Companies Midwest, LLC  
 Attn: Patrick Finn  
 900 Long Lake Rd, Suite 180  
 Lighthouse Management Group, Inc.  
 New Brighton, MN 55112

### Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
02/04/25	S. Kinsella	Analyze garnishment issue.	0.20	127.00
02/04/25	A. Griffin	Draft and provide Notice of Garnishment to K. Nixon and S. Kinsella.	0.20	64.00
02/11/25	A. Griffin	Analyze default judgments and garnishment procedures.	0.40	128.00
02/11/25	A. Artz	Review information needed for garnishment process in ND.	0.40	132.00
02/11/25	K. Nixon	Strategize and conduct research re: ND garnishment process.	0.90	436.50
02/12/25	A. Griffin	Review ND Garnishment statute and analyze 10-day notice requirement issue.	0.50	160.00
02/12/25	A. Artz	Communications regarding garnishment procedure.	0.20	66.00
02/19/25	S. Kinsella	Communications with parties-in-interest regarding settlement proposal.	0.10	63.50
02/21/25	A. Artz	Analyze 10 day notice period under section 32-09.1-04.	0.10	33.00
02/24/25	A. Artz	Request information for garnishment documents.	0.10	33.00
02/24/25	S. Kinsella	Provide instruction regarding garnishment strategy.	0.10	63.50
02/25/25	A. Griffin	Locate and provide example of garnishment summons and garnishment disclosures.	0.50	160.00
02/25/25	S. Kinsella	Provide instruction regarding garnishment.	0.10	63.50
02/26/25	K. Nixon	Attention to garnishment issues.	0.40	194.00
02/26/25	A. Artz	Draft garnishment summons and disclosures.	0.70	231.00
02/26/25	S. Kinsella	Analyze garnishment issue.	0.20	127.00
02/27/25	A. Artz	Draft garnishment summons and disclosures.	2.50	825.00
02/27/25	S. Kinsella	Consult on garnishment issue.	0.10	63.50



Invoice:  
Invoice Date:  
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02/28/25	S. Kinsella	Finalize garnishment summons and provide instruction regarding service.	0.40	254.00
02/28/25	A. Artz	Review and revise garnishment summons and disclosures.	0.40	132.00
02/28/25	K. Nixon	Finalize garnishment summonses, disclosure forms, and cover letters.	1.30	630.50
<b>Current Legal Fees:</b>			<b>9.80</b>	<b>\$ 3,987.00</b>

#### Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Steven R. Kinsella	635.00	1.20	762.00
Katherine Nixon	485.00	2.60	1,261.00
Austin Artz	330.00	4.40	1,452.00
Abigale R. Griffin	320.00	1.60	512.00
<b>Total</b>		<b>9.80</b>	<b>\$ 3,987.00</b>

#### Costs and Other Charges

		<u>Amount</u>
01/14/25	Filing fee Cass County Clerk of District Court - 00000 - Foreign Judgment Fee	(10.00)
02/17/25	COURTS/USBC-ND-P - Summons and Complaint – Adversary Fee	350.00
02/21/25	US Bancorp (PO Box 6343 Fargo ND 58125) - Fargo 021525 - Cass County District Court	10.00

**Current Costs and Other Charges:** **\$ 350.00**

#### Invoice Totals

Total for Current Legal Fees:	\$ 3,987.00
Total For Current Costs and Other Charges:	\$ 350.00
<b>Total For Current Invoice:</b>	<b>\$ 4,337.00</b>



Invoice: 1914082  
Invoice Date: March 5, 2025  
Client Number: 097807  
Matter Number: 097807.0006

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through February 28, 2025

Regarding: Adversary against SAD Downtown, LLC d/b/a The Firm

Total for Current Legal Fees:	\$ 1,097.00
<b>Total For Current Invoice:</b>	<b>\$ 1,097.00</b>

**NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.**

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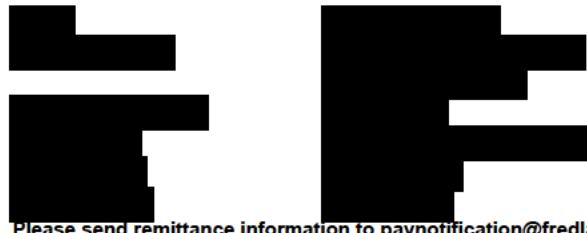
**Remittance Address:**

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P.O. Box 1484  
Minneapolis, MN 55480-1484

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Invoice: 1914082  
Invoice Date: March 5, 2025  
Page:

#### Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
02/05/25	1907746	257.50		257.50
<b>Total Prior Balance:</b>				<b>\$ 257.50</b>

To avoid duplicate payments, the Prior Balance reflects what was still due as of March 5, 2025. If payment has been sent close to this date, please verify payment status.



Invoice: 1914082  
Invoice Date: March 5, 2025  
Client Number: 097807  
Matter Number: 097807.0006

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

### Legal Fees

Date	Timekeeper	Description	Hours	Amount
02/13/25	S. Kinsella	Provide instruction regarding jury issue status conference.	0.20	127.00
02/13/25	K. Nixon	Prepare for status conference and review jury trial issue.	1.90	921.50
02/19/25	K. Nixon	Respond to email from Court staff re: scheduling of continued status conference.	0.10	48.50
<b>Current Legal Fees:</b>			<b>2.20</b>	<b>\$ 1,097.00</b>

### Timekeeper Summary

Timekeeper	Bill Rate	Hours	Billed Amount
Steven R. Kinsella	635.00	0.20	127.00
Katherine Nixon	485.00	2.00	970.00
<b>Total</b>		<b>2.20</b>	<b>\$ 1,097.00</b>

### Invoice Totals

Total for Current Legal Fees: \$ 1,097.00

**Total For Current Invoice:** \$ 1,097.00



Invoice: 1914083  
Invoice Date: March 5, 2025  
Client Number: 097807  
Matter Number: 097807.0007

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through February 28, 2025

**Regarding: Adversary against Greenfield Commons**

Total for Current Legal Fees:	\$ 966.50
<b>Total For Current Invoice:</b>	<b>\$ 966.50</b>

**NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.**

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Invoice: 1914083  
Invoice Date: March 5, 2025  
Page:

#### Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
02/05/25	1907747	1,333.50		1,333.50
<b>Total Prior Balance:</b>				<b>\$ 1,333.50</b>

To avoid duplicate payments, the Prior Balance reflects what was still due as of March 5, 2025. If payment has been sent close to this date, please verify payment status.



Invoice: 1914083  
Invoice Date: March 5, 2025  
Client Number: 097807  
Matter Number: 097807.0007

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

### Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
02/13/25	S. Kinsella	Communications with defense counsel (.1); analyze settlement proposals (.1).	0.20	127.00
02/19/25	S. Kinsella	Communications with opposing counsel regarding settlement proposal.	0.10	63.50
02/19/25	K. Nixon	Draft motion for default judgment against Area 57 Association, Inc.	1.00	485.00
02/20/25	K. Nixon	Finalize motion for default judgment against Area 57 Association, Inc. and coordinate service of the same.	0.50	242.50
02/21/25	K. Nixon	Email courtesy copy of motion for default judgment to G. Singer.	0.10	48.50
<b>Current Legal Fees:</b>			<b>1.90</b>	<b>\$ 966.50</b>

### Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Steven R. Kinsella	635.00	0.30	190.50
Katherine Nixon	485.00	1.60	776.00
<b>Total</b>		<b>1.90</b>	<b>\$ 966.50</b>

### Invoice Totals

Total for Current Legal Fees:	\$ 966.50
<b>Total For Current Invoice:</b>	<b>\$ 966.50</b>



Invoice: 1914084  
Invoice Date: March 5, 2025  
Client Number: 097807  
Matter Number: 097807.0008

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through February 28, 2025

**Regarding: Adversary against EPIC Holdings II**

Total for Current Legal Fees:	\$ 3,051.50
<b>Total For Current Invoice:</b>	<b>\$ 3,051.50</b>

**NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.**

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If you have any questions please email [accounting@fredlaw.com](mailto:accounting@fredlaw.com) or contact a client representative at 612.492.7574.

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P.O. Box 1484  
Minneapolis, MN 55480-1484

**Online Payments:**

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**Wire Instructions:**



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**Tax ID:** [REDACTED]

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Invoice: 1914084  
Invoice Date: March 5, 2025  
Page:

#### Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
02/05/25	1907748	97.00		97.00
<b>Total Prior Balance:</b>				<b>\$ 97.00</b>

To avoid duplicate payments, the Prior Balance reflects what was still due as of March 5, 2025. If payment has been sent close to this date, please verify payment status.



Invoice: 1914084  
Invoice Date: March 5, 2025  
Client Number: 097807  
Matter Number: 097807.0008

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

### Legal Fees

Date	Timekeeper	Description	Hours	Amount
02/06/25	S. Kinsella	Revise settlement proposal.	0.70	444.50
02/12/25	S. Kinsella	Analyze settlement proposal.	0.20	127.00
02/13/25	S. Kinsella	Analyze settlement proposal and prepare revised offer.	0.70	444.50
02/14/25	S. Kinsella	Negotiate settlement terms.	0.30	190.50
02/18/25	S. Kinsella	Phone call with defense counsel (.7); follow up phone call with CRO (.3); analyze settlement proposal (.3).	1.30	825.50
02/19/25	S. Kinsella	Attention to status conference.	0.20	127.00
02/19/25	K. Nixon	Attend scheduling conference and provide updates to client.	0.40	194.00
02/20/25	S. Kinsella	Draft settlement agreement terms.	0.80	508.00
02/21/25	S. Kinsella	Negotiations with defendant regarding settlement terms.	0.30	190.50
<b>Current Legal Fees:</b>			<b>4.90</b>	<b>\$ 3,051.50</b>

### Timekeeper Summary

Timekeeper	Bill Rate	Hours	Billed Amount
Steven R. Kinsella	635.00	4.50	2,857.50
Katherine Nixon	485.00	0.40	194.00
<b>Total</b>		<b>4.90</b>	<b>\$ 3,051.50</b>

### Invoice Totals

Total for Current Legal Fees: \$ 3,051.50



Invoice: 1914084  
Invoice Date: March 5, 2025  
Page: 2

**Total For Current Invoice:** **\$ 3,051.50**



Invoice: 1914085  
Invoice Date: March 5, 2025  
Client Number: 097807  
Matter Number: 097807.0009

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through February 28, 2025

Regarding: Adversary against U of J MU Jamestown, LLC

Total for Current Legal Fees:	\$ 1,247.00
<b>Total For Current Invoice:</b>	<b>\$ 1,247.00</b>

**NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.**

*Payment is due within 30 days from receipt of invoice*  
If you have any questions please email [accounting@fredlaw.com](mailto:accounting@fredlaw.com) or contact a client representative at 612.492.7574.

**Remittance Address:**

Fredrikson & Byron P.A.  
P.O. Box 1484  
Minneapolis, MN 55480-1484

**Online Payments:**

[Fredlaw.com/payment](http://Fredlaw.com/payment)

**Wire Instructions:**

[REDACTED]  
[REDACTED]

Please send remittance information to [paynotification@fredlaw.com](mailto:paynotification@fredlaw.com)

**Tax ID:** [REDACTED]

*\*\* Please note that Fredrikson & Byron will be adjusting its standard hourly billing rate schedule and some service charges rendered after January 1, 2025. If you have questions about the billing rates of specific individuals, please contact your billing attorney.\*\**

**Please remit this page with your payment. Thank you. We appreciate your business.**



Invoice: 1914085  
Invoice Date: March 5, 2025  
Page:

#### Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
02/05/25	1907749	959.50		959.50
<b>Total Prior Balance:</b>				<b>\$ 959.50</b>

To avoid duplicate payments, the Prior Balance reflects what was still due as of March 5, 2025. If payment has been sent close to this date, please verify payment status.



Invoice: 1914085  
Invoice Date: March 5, 2025  
Client Number: 097807  
Matter Number: 097807.0009

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

### Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
02/03/25	S. Kinsella	Revise settlement agreement and send to defendant.	0.50	317.50
02/05/25	S. Kinsella	Communications with defendant regarding potential changes to settlement agreement.	0.30	190.50
02/11/25	S. Kinsella	Coordinate final settlement agreement.	0.10	63.50
02/12/25	S. Kinsella	Finalize settlement agreement.	0.20	127.00
02/12/25	K. Nixon	Finalize settlement agreement and prepare motion to approve the same.	0.50	242.50
02/13/25	S. Kinsella	Finalize settlement agreement.	0.10	63.50
02/13/25	K. Nixon	Finalize settlement agreement and motion to approve the same and circulate copies to client and borrower representatives.	0.50	242.50
<b>Current Legal Fees:</b>			<b>2.20</b>	<b>\$ 1,247.00</b>

### Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Steven R. Kinsella	635.00	1.20	762.00
Katherine Nixon	485.00	1.00	485.00
<b>Total</b>		<b>2.20</b>	<b>\$ 1,247.00</b>

### Invoice Totals

Total for Current Legal Fees:	\$ 1,247.00
<b>Total For Current Invoice:</b>	<b>\$ 1,247.00</b>



Invoice: 1914086  
Invoice Date: March 5, 2025  
Client Number: 097807  
Matter Number: 097807.0011

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through February 28, 2025

**Regarding: Adversary against 36th and Veterans, LLC**

Total for Current Legal Fees:	\$ 829.00
<b>Total For Current Invoice:</b>	<b>\$ 829.00</b>

**NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.**

*Payment is due within 30 days from receipt of invoice*  
If you have any questions please email [accounting@fredlaw.com](mailto:accounting@fredlaw.com) or contact a client representative at 612.492.7574.

**Remittance Address:**

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P.O. Box 1484  
Minneapolis, MN 55480-1484

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**Wire Instructions:**



Please send remittance information to [paynotification@fredlaw.com](mailto:paynotification@fredlaw.com)

**Tax ID:** [REDACTED]

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**Please remit this page with your payment. Thank you. We appreciate your business.**



Invoice: 1914086  
Invoice Date: March 5, 2025  
Page:

#### Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
02/05/25	1907751	929.50		929.50
<b>Total Prior Balance:</b>				<b>\$ 929.50</b>

To avoid duplicate payments, the Prior Balance reflects what was still due as of March 5, 2025. If payment has been sent close to this date, please verify payment status.



Invoice: 1914086  
Invoice Date: March 5, 2025  
Client Number: 097807  
Matter Number: 097807.0011

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

### Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
02/05/25	K. Nixon	Attention to notice of returned mail.	0.10	48.50
02/06/25	S. Kinsella	Attention to service issue and provide instruction regarding the same.	0.10	63.50
02/07/25	K. Nixon	Review supplemental certificate of service.	0.10	48.50
02/11/25	S. Kinsella	Phone call with defense counsel regarding default judgment motion and answer (.2); phone call with CRO regarding the same (.4); review answer (.3).	0.90	571.50
02/11/25	K. Nixon	Email CRO re: copy of answer and withdrawal of motion for default judgment.	0.10	48.50
02/13/25	K. Nixon	Review scheduling order and email client re: the same.	0.10	48.50
<b>Current Legal Fees:</b>				<b>1.40</b>
				<b>\$ 829.00</b>

### Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Steven R. Kinsella	635.00	1.00	635.00
Katherine Nixon	485.00	0.40	194.00
<b>Total</b>		<b>1.40</b>	<b>\$ 829.00</b>

### Invoice Totals

Total for Current Legal Fees:	\$ 829.00
<b>Total For Current Invoice:</b>	<b>\$ 829.00</b>



Invoice: 1914087  
Invoice Date: March 5, 2025  
Client Number: 097807  
Matter Number: 097807.0012

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through February 28, 2025

Regarding: Adversary against LTC – The Lincoln, LLC

Total for Current Legal Fees:	\$ 1,269.00
<b>Total For Current Invoice:</b>	<b>\$ 1,269.00</b>

*Payment is due within 30 days from receipt of invoice*  
If you have any questions please email [accounting@fredlaw.com](mailto:accounting@fredlaw.com) or contact a client representative at 612.492.7574.

**Remittance Address:**

Fredrikson & Byron P.A.  
P.O. Box 1484  
Minneapolis, MN 55480-1484

**Online Payments:**

[Fredlaw.com/payment](http://Fredlaw.com/payment)

**Wire Instructions:**



Please send remittance information to [paynotification@fredlaw.com](mailto:paynotification@fredlaw.com)

**Tax ID:** [REDACTED]

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**Please remit this page with your payment. Thank you. We appreciate your business.**



Invoice: 1914087  
Invoice Date: March 5, 2025  
Client Number: 097807  
Matter Number: 097807.0012

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

### Legal Fees

Date	Timekeeper	Description	Hours	Amount
02/03/25	K. Nixon	Revise complaint based on updated amounts owed.	0.70	339.50
02/04/25	S. Kinsella	Review complaint.	0.10	63.50
02/04/25	K. Nixon	Revise complaint with updated amounts owed.	0.20	97.00
02/11/25	S. Kinsella	Communications with defense counsel.	0.10	63.50
02/12/25	S. Kinsella	Prepare and send counteroffer.	0.30	190.50
02/14/25	S. Kinsella	Finalize complaint.	0.10	63.50
02/14/25	K. Nixon	Coordinate execution of complaint affidavit page.	0.20	97.00
02/17/25	S. Kinsella	Finalize and file complaint.	0.10	63.50
02/17/25	K. Nixon	Finalize complaint for filing.	0.40	194.00
02/19/25	K. Nixon	Email courtesy copy of complaint to A. Swedberg.	0.10	48.50
02/20/25	K. Nixon	Attention to filing of 7007.1 statements.	0.10	48.50
<b>Current Legal Fees:</b>				<b>2.40</b> <b>\$ 1,269.00</b>

### Timekeeper Summary

Timekeeper	Bill Rate	Hours	Billed Amount
Steven R. Kinsella	635.00	0.70	444.50
Katherine Nixon	485.00	1.70	824.50
<b>Total</b>		<b>2.40</b>	<b>\$ 1,269.00</b>

### Invoice Totals

Total for Current Legal Fees: \$ 1,269.00



Invoice: 1914087  
Invoice Date: March 5, 2025  
Page: 2

**Total For Current Invoice:** **\$ 1,269.00**



Invoice: 1914088  
Invoice Date: March 5, 2025  
Client Number: 097807  
Matter Number: 097807.0013

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through February 28, 2025

Regarding: Adversary against Pioneer Place Holdings, LLC

Total for Current Legal Fees:	\$ 1,905.00
<b>Total For Current Invoice:</b>	<b>\$ 1,905.00</b>

**NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.**

*Payment is due within 30 days from receipt of invoice*  
If you have any questions please email [accounting@fredlaw.com](mailto:accounting@fredlaw.com) or contact a client representative at 612.492.7574.

**Remittance Address:**

Fredrikson & Byron P.A.  
P.O. Box 1484  
Minneapolis, MN 55480-1484

**Online Payments:**

[Fredlaw.com/payment](http://Fredlaw.com/payment)

**Wire Instructions:**

[REDACTED]  
[REDACTED]

Please send remittance information to [paynotification@fredlaw.com](mailto:paynotification@fredlaw.com)

Tax ID: [REDACTED]

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**Please remit this page with your payment. Thank you. We appreciate your business.**



Invoice: 1914088  
Invoice Date: March 5, 2025  
Page:

#### Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
02/05/25	1907752	515.00		515.00
<b>Total Prior Balance:</b>				<b>\$ 515.00</b>

To avoid duplicate payments, the Prior Balance reflects what was still due as of March 5, 2025. If payment has been sent close to this date, please verify payment status.



Invoice: 1914088  
Invoice Date: March 5, 2025  
Client Number: 097807  
Matter Number: 097807.0013

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

### Legal Fees

Date	Timekeeper	Description	Hours	Amount
02/10/25	S. Kinsella	Prepare settlement proposal.	0.20	127.00
02/11/25	S. Kinsella	Prepare revised term sheet (.6); analyze garnishment issues (.4).	1.00	635.00
02/12/25	S. Kinsella	Coordinate settlement agreement terms.	0.10	63.50
02/20/25	S. Kinsella	Settlement negotiations.	0.10	63.50
02/24/25	S. Kinsella	Revise settlement proposal.	0.70	444.50
02/25/25	S. Kinsella	Analyze operating agreement and settlement issue.	0.20	127.00
02/26/25	S. Kinsella	Review organizational documents.	0.70	444.50
<b>Current Legal Fees:</b>			<b>3.00</b>	<b>\$ 1,905.00</b>

### Timekeeper Summary

Timekeeper	Bill Rate	Hours	Billed Amount
Steven R. Kinsella	635.00	3.00	1,905.00
<b>Total</b>		<b>3.00</b>	<b>\$ 1,905.00</b>

### Invoice Totals

Total for Current Legal Fees: \$ 1,905.00  
**Total For Current Invoice:** **\$ 1,905.00**



Invoice: 1914089  
Invoice Date: March 5, 2025  
Client Number: 097807  
Matter Number: 097807.0014

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through February 28, 2025

Regarding: Adversary against EPIC Management, LLC

Total for Current Legal Fees:	\$ 436.50
<b>Total For Current Invoice:</b>	<b>\$ 436.50</b>

*Payment is due within 30 days from receipt of invoice*  
If you have any questions please email [accounting@fredlaw.com](mailto:accounting@fredlaw.com) or contact a client representative at 612.492.7574.

**Remittance Address:**

Fredrikson & Byron P.A.  
P.O. Box 1484  
Minneapolis, MN 55480-1484

**Online Payments:**

[Fredlaw.com/payment](http://Fredlaw.com/payment)

**Wire Instructions:**



Please send remittance information to [paynotification@fredlaw.com](mailto:paynotification@fredlaw.com)

**Tax ID:** [REDACTED]

*\*\* Please note that Fredrikson & Byron will be adjusting its standard hourly billing rate schedule and some service charges rendered after January 1, 2025. If you have questions about the billing rates of specific individuals, please contact your billing attorney.\*\**

**Please remit this page with your payment. Thank you. We appreciate your business.**



Invoice: 1914089  
Invoice Date: March 5, 2025  
Client Number: 097807  
Matter Number: 097807.0014

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

### Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
02/03/25	K. Nixon	Draft default judgment motion and send to CRO for review.	0.40	194.00
02/04/25	K. Nixon	Finalize motion for default judgment and email CRO copy of the same.	0.40	194.00
02/05/25	K. Nixon	Review draft certificate of service.	0.10	48.50
<b>Current Legal Fees:</b>			<b>0.90</b>	<b>\$ 436.50</b>

### Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Katherine Nixon	485.00	0.90	436.50
<b>Total</b>		<b>0.90</b>	<b>\$ 436.50</b>

### Invoice Totals

Total for Current Legal Fees: \$ 436.50

**Total For Current Invoice:** **\$ 436.50**



Invoice: 1914090  
Invoice Date: March 5, 2025  
Client Number: 097807  
Matter Number: 097807.0017

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through February 28, 2025

Regarding: Adversary against LTC – The Falcon, LLC

Total for Current Legal Fees:	\$ 63.50
<b>Total For Current Invoice:</b>	<b>\$ 63.50</b>

**NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.**

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**Remittance Address:**

Fredrikson & Byron P.A.  
P.O. Box 1484  
Minneapolis, MN 55480-1484

**Online Payments:**

[Fredlaw.com/payment](http://Fredlaw.com/payment)

**Wire Instructions:**

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Please send remittance information to [paynotification@fredlaw.com](mailto:paynotification@fredlaw.com)

**Tax ID:** [REDACTED]

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**Please remit this page with your payment. Thank you. We appreciate your business.**



Invoice: 1914090  
Invoice Date: March 5, 2025  
Page:

#### Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
02/05/25	1907754	381.00		381.00
<b>Total Prior Balance:</b>				<b>\$ 381.00</b>

To avoid duplicate payments, the Prior Balance reflects what was still due as of March 5, 2025. If payment has been sent close to this date, please verify payment status.



Invoice: 1914090  
Invoice Date: March 5, 2025  
Client Number: 097807  
Matter Number: 097807.0017

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

### Legal Fees

Date	Timekeeper	Description	Hours	Amount
02/20/25	S. Kinsella	Review order approving settlement.	0.10	63.50
		<b>Current Legal Fees:</b>	<b>0.10</b>	<b>\$ 63.50</b>

### Timekeeper Summary

Timekeeper	Bill Rate	Hours	Billed Amount
Steven R. Kinsella	635.00	0.10	63.50
<b>Total</b>		<b>0.10</b>	<b>\$ 63.50</b>

### Invoice Totals

Total for Current Legal Fees:	\$ 63.50
<b>Total For Current Invoice:</b>	<b>\$ 63.50</b>



Invoice: 1914091  
Invoice Date: March 5, 2025  
Client Number: 097807  
Matter Number: 097807.0018

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through February 28, 2025

Regarding: Adversary action against EPIC Holdings LLC

Total for Current Legal Fees:	\$ 254.00
<b>Total For Current Invoice:</b>	<b>\$ 254.00</b>

*Payment is due within 30 days from receipt of invoice*  
If you have any questions please email [accounting@fredlaw.com](mailto:accounting@fredlaw.com) or contact a client representative at 612.492.7574.

**Remittance Address:**

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P.O. Box 1484  
Minneapolis, MN 55480-1484

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**Wire Instructions:**



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**Tax ID:** [REDACTED]

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Invoice: 1914091  
Invoice Date: March 5, 2025  
Client Number: 097807  
Matter Number: 097807.0018

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

### Legal Fees

Date	Timekeeper	Description	Hours	Amount
02/03/25	S. Kinsella	Revise settlement proposal and send to defendant.	0.40	254.00
		<b>Current Legal Fees:</b>	<b>0.40</b>	<b>\$ 254.00</b>

### Timekeeper Summary

Timekeeper	Bill Rate	Hours	Billed Amount
Steven R. Kinsella	635.00	0.40	254.00
<b>Total</b>		<b>0.40</b>	<b>\$ 254.00</b>

### Invoice Totals

Total for Current Legal Fees:	\$ 254.00
<b>Total For Current Invoice:</b>	<b>\$ 254.00</b>

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NORTH DAKOTA**

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In re:

EPIC Companies Midwest, LLC,  
EPIC Companies Midwest 2023, LLC,  
EPIC Employee, LLC,  
EOLA Capital, LLC, and  
EC West Fargo, LLC,

Debtors.

**Jointly Administered**

Bankruptcy No. 24-30281  
Bankruptcy No. 24-30282  
Bankruptcy No. 24-30283  
Bankruptcy No. 24-30284  
Bankruptcy No. 24-30285

Chapter 11

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**NOTICE OF SEVENTH APPLICATION OF FREDRIKSON & BYRON, P.A. FOR  
ALLOWANCE OF FEES AND EXPENSES AS CHAPTER 11 COUNSEL FOR THE  
DEBTORS FROM FEBRUARY 1, 2025 THROUGH FEBRUARY 28, 2025**

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TO: The parties-in-interest as specified in the Notice and Service Requirements adopted pursuant to Local Rule 2002-1 and the Court's order limiting notice pursuant to Fed. R. Bankr. P. 2002(i). (ECF No. 124.)

1. **NOTICE IS HEREBY GIVEN** that Fredrikson & Byron, P.A., as Chapter 11 counsel for the Debtors, has filed its seventh application for allowance of fees and expenses, a copy of which is attached hereto and served upon you.

2. **NOTICE IS FURTHER GIVEN** that any objection to the application must be filed with the Clerk of the United States Bankruptcy Court, whose address is Quentin N. Burdick Courthouse, 655 First Avenue North, Suite 210, Fargo, North Dakota 58102, and served upon the attorney whose name and address is listed below, by **Friday, March 28, 2025, which is twenty-one (21) days from the date of the filing of this Notice**. Any objections not filed and served may be deemed waived.

Dated: March 7, 2025

/e/ *Steven R. Kinsella*

Michael S. Raum (#05676)

**FREDRIKSON & BYRON, P.A.**

51 Broadway, Suite 400

Fargo, ND 58102-4991

701.237.8200

mraum@fredlaw.com

Steven R. Kinsella (#09514)

Katherine A. Nixon (*pro hac vice* MN #0402772)

**FREDRIKSON & BYRON, P.A.**

60 South 6<sup>th</sup> Street, Suite 1500

Minneapolis, MN 55402-4400

612.492.7000

skinsella@fredlaw.com

knixon@fredlaw.com

**ATTORNEYS FOR DEBTORS**